

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

Timothy Bell,

Case No. 20-23303-kmp

Debtor.

Chapter 13

Address: 7207 W Cody Cir, Milwaukee, WI 53223
Last four digits of Social Security No. or EIN: 4385

**NOTICE OF MOTION TO AMEND THE COURT'S AUGUST 9, 2021 DOOMSDAY
ORDER TO ENLARGE THE TIME TO COMPLY *AFTER* DEADLINE EXPIRATION**

Timothy Bell, the debtor, moves under Federal Rule of Bankruptcy Procedure 9006(b)(1) to enlarge the deadlines set in the court's August 9, 2021 order.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in motion, or if you want the court to consider your views on the motion, then on or before **March 7, 2022**, you or your attorney must:

File with the court a written response explaining your position at:

United States Bankruptcy Court
517 East Wisconsin Avenue, Room 126
Milwaukee, WI 53202

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

MILLER & MILLER LAW, LLC
633 W Wisconsin Ave, Ste 500
Milwaukee, Wisconsin 53203-1918
(414) 277-7742 (o) (414) 277-1303 (f)

You must also send a copy to:

Attorney Hayden F. Knight
Miller & Miller Law, LLC
633 W Wisconsin Ave, Ste 500
Milwaukee, WI 53203

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may determine that your failure to object constitutes grounds to enter an order granting that relief.

Miller & Miller Law, LLC

Attorney for Debtor

Dated: February 28, 2022

By: /s/Hayden F. Knight
Hayden F. Knight

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

Timothy Bell,

Case No. 20-23303-kmp

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Chapter 13

**MOTION TO AMEND THE COURT’S AUGUST 9, 2021 DOOMSDAY ORDER TO
ENLARGE THE TIME TO COMPLY *AFTER* DEADLINE EXPIRATION¹**

Timothy Bell, the debtor, moves under Federal Rule of Bankruptcy Procedure 9006(b)(1) to enlarge the deadlines set in the court’s August 9, 2021 order. **The debtor is filing and serving this motion after the expiration of those deadlines.** The debtor states that the debtor’s failure to act was the result of excusable neglect based on the circumstances described below:

1. On August 9, 2021, the court entered an order resolving the Motion For Relief filed by U.S. Bank Trust NA, as Trustee of the Bungalow Series IV Trust (hereinafter “the Creditor”). The order required, among other provisions, that commencing with the August 1, 2021 payment and continuing through and including the January 1, 2022 payment, the debtor shall make all monthly

mortgage payments to the Creditor in sufficient time to be received on or before the 16th day of each month in which each such payment is due.

2. The Debtor's mortgage payment amount changed during the course of the doomsday period and the Debtor was unaware of the payment increase.

Debtor remitted payments in the previous amount and then fell behind due to unforeseen expenses. Debtor attempted to get current in December 2021 but was unable to remit further payment after that time. Debtor is now aware of the current monthly payment amount and will remit this amount going forward.

3. Debtor has been able to garner sufficient commissions in the coming month to bring the account current and provide for both March and April's payments before the end of March. Debtor plans to get current and provide for these payments in two separate payments, the first of which he will make on or before March 15, 2022 and the second he will make on or before March 31, 2022. After this time, Debtor is confident that he will remain current on the mortgage payments going forward.
4. These circumstances show that the debtor's failure to act by the deadline set in the court's August 9, 2021 order was the result of excusable neglect justifying the enlargement of the deadline.

For these reasons, the debtor requests that the court enlarge the time for the debtor to remit the December, January, February, and March payments to March 31, 2022, and to amend the Doomsday by extending it three additional months, commencing April 2022 through and including June 2022.

Miller & Miller Law, LLC

Attorney for Debtor

Dated: February 28, 2022

By: /s/Hayden F. Knight
Hayden F. Knight

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF WISCONSIN

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CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that on February 28, 2022, a copy of the foregoing Motion that was filed February 28, 2022, was served electronically or at their proper post office address after their respective names on the following parties:

Timothy Bell
7207 W Cody Cir
Milwaukee, WI 53223

Trustee Scott Lieske, by ECF

US Trustee, by ECF

U.S. Bank Trust NA, as Trustee of the Bungalow Series IV Trust,
c/o Attorney Bryan M. Ward, by ECF

/s/Hayden F. Knight
Hayden F. Knight
Miller & Miller Law, LLC
633 W Wisconsin Ave, Ste 500
Milwaukee, WI 53203-1918
(414) 277-7742
(414) 277-1303 (fax)
hayden@millermillerlaw.com